

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS**

David W. Qualls,

Plaintiff,

Civil File No.: 5:12-CV-0089-SWW

vs.

RULE 26(f) REPORT

Professional Credit Management, Inc.,

Defendant.

Defendant, after consultation with the Plaintiff's counsel, and pursuant to Fed. R. Civ. P. 26(f), Local Rule 26.1, and this Court's Initial Scheduling Order, files this report:

1. The parties propose mandatory disclosures under Fed. R. Civ. P. 26(a) to be completed by July 30, 2012.
2. Defendant believes discovery on claims raised by Plaintiff will be necessary, concerning alleged liability and damages. The parties do not anticipate discovery problems in this case.
3. The parties are unaware of the need for any discovery related to computer-based media, but each party reserves the right to seek such discovery as needed.
4. Defendant's counsel has a conflict with the February 11, 2013 trial date (due to other trials scheduled for that time frame in Dakota County District Court, Minnesota, and in Burleigh County, North Dakota), and therefore proposes a continuance of at least two weeks.

5. The parties believe that no changes should be made to limitations on discovery in the Federal Rules of Civil Procedure, and preserve any objections to specific questions, interrogatories, requests for production, or requests for admission posed by the adverse party.

6. The parties are not aware of any orders, including protective orders, that should be entered at this time, but each party specifically reserves the right to seek protective orders at a later date.

7. The parties propose that all discovery begin July 03, 2012 and be completed no later than 60 days before the trial date.

8. The parties proposed that all motions, other than motions in limine, be filed no later than 60 days before the trial date.

9. The parties propose that all other parties be joined, and all pleadings be amended, no later than October 1, 2012, unless agreed by the adverse party.

10. Counsel for the Plaintiff has authorized Defendant to state that Plaintiff is in agreement with the proposals and statements contained in this Rule 26(f) Report.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Christopher R. Morris, hereby certify that service of the foregoing has been made by following electronic filing through the Federal Judiciary's Case Management/Electronic Case Filing system on this 21st day of June, 2012, at the following:

Victoria Leigh, Esq.
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/s/ Christopher R. Morris
Christopher R. Morris